

EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:13-cv-10412-FDS

JUANITA M. RIVERA and	:	
ANTHONY RIVERA, w/h,	:	
	:	
Plaintiffs,	:	MDL No. 2419
	:	Master Docket No. 1:13-md-2419-FDS
v.	:	
	:	Honorable F. Dennis Saylor
UNIFIRST CORPORATION, A/D/B/A	:	
UNICLEAN CLEANROOM SERVICES,	:	
INSPIRA HEALTH NETWORK, INC.	:	
F/K/A SOUTH JERSEY HEALTH	:	
SYSTEM, INC.,	:	
INSPIRA MEDICAL CENTERS, INC.	:	
F/K/A SOUTH JERSEY HOSPITAL,	:	
INC.,	:	
	:	
Defendants.	:	

PLAINTIFFS' SUPPLEMENTAL INTERROGATORIES
ADDRESSED TO NITESH BHAGAT, M.D. AND DEFENDANTS, INSPIRA HEALTH
NETWORK AND INSPIRA MEDICAL CENTERS, INC.

Plaintiffs, by and through their attorneys, hereby propound the following Supplemental Interrogatories to the above named defendant. These Interrogatories are continuing and any information secured subsequent to the filing of your Answers, which would have been included in the Answers had it been known or available, is to be supplied by Supplemental Answers thereto, pursuant to the appropriate Federal Rules of Civil Procedure. (Pertinent medical records which were provided by Inspira are attached as Exhibit A, Bates Stamped pages 1- 70).

1. Did Dr. Bhagat perform nerve root injections and/or epidural injections upon Juanita Rivera on June 13, 2012, July 19, 2012 and/or September 12, 2012 at South Jersey Healthcare (now known as Inspira)?

2. On June 13, 2012, July 19, 2012 and/or September 12, 2012, did Dr. Bhagat have a written employment contract and/or privileges to perform epidural injections and/or nerve root injections at South Jersey Healthcare? If so, please provide a copy of the applicable contract and/or privileges.

3. Please provide all of the dates of contact between Dr. Bhagat and Mrs. Rivera and the location for same?

4. Did Dr. Bhagat ever provide South Jersey Healthcare with a prescription in connection with the drug(s) that would be injected into Mrs. Rivera on June 13, 2012, July 19, 2012 and September 12, 2012? If yes, please provide a copy.

5. Did Dr. Bhagat provide the Orders at Bates-Stamped pp. 57 and 12 of Exhibit "A" in connection with the June 13, 2012 and/or September 12, 2012 procedures?

6. Did Dr. Bhagat provide an Order for the July 19, 2012 injection? If so, please provide. If not, why not?

7. At the time Dr. Bhagat injected Mrs. Rivera, was Dr. Bhagat aware that the medication used was preservative-free methylprednisolone acetate (MPA) compounded by New England Compounding Pharmacy? If not, did Dr. Bhagat ever become aware of this information and when?

8. Did Dr. Bhagat ever request, either verbally or in writing, that South Jersey Healthcare purchase preservative-free MPA from New England Compounding Pharmacy to be used for nerve root injections and/or epidural injection prior to June 13, 2012, July 19, 2012 and/or September 12, 2012? If yes, when and why? If in writing, please provide.

9. On or before June 13, 2012, July 19, 2012 and September 12, 2012, was Dr. Bhagat aware that South Jersey Healthcare purchased preservative-free MPA from New England Compounding Pharmacy? If yes, how did Dr. Bhagat become aware?

10. Whose decision was it to purchase preservative-free MPA from New England Compounding Pharmacy to be used for nerve root injections and/or epidural injections prior to June 13, 2012; July 12, 2012 and/or September 12, 2012 and when was the decision made?

11. What, if any, input did Dr. Bhagat have in determining where Inspira purchased preservative-free MPA?

SALTZ, MONGELUZZI, BARRETT & BENDESKY

/s/ Michael F. Barrett
MICHAEL F. BARRETT, ESQ.
MARY T. GIDARO, ESQ.

Date: December 18, 2013

CERTIFICATE OF SERVICE

I, Mary T. Gidaro, Esquire, hereby certify that a true and correct copy of Plaintiffs' Supplemental Interrogatories Addressed to Defendants was furnished to all counsel of record as follows by first class mail on the 18th day of December.

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By:


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